



**Board of County Road Commissioners
and Park Trustees of The County of Kent**

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April 20, 1992

Federal Communications Commission
1919 M Street, N.W. 222
Washington, D.C. 20554

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

ATTN: Docket 92-235

It has been brought to our attention that the above docket proposes to reduce base station input power and require the use of 4khz narrow band FM transmissions after January 1, 1996.

We are opposed to this docket for proposed rule making at this time for the following reasons:

1. Reducing transmitter output power is not a feasible alternative in our county with population over 600,000 because of the geographical attributes of the land. We have a number of large hills which already imposes limitations on our communications capability. As a public service agency, efficient communications is absolutely essential to our mission of providing safe and adequate transportation to the traveling public and emergency vehicles.
2. The cost of replacing all mobil and base radios with narrow band units by January 1, 1996, would work a financial hardship on our organization.

We recognize the lack of space on the limited band width and we strongly support the more efficient use of that band width thru the use of narrow band FM.

However, we respectfully request that consideration be given to phasing in this change over a period extending beyond January 1, 1996. We need more time to prepare for the transistion and the suplliers need more time indroduce the new equipment so as to provide competitive pricing.

Very truly yours,

David A. Bosch

David A. Bosch
Secretary to the Board

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